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12
13 IN THE UNITED STATES DISTRICT COURT
14
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,) Case No: 2:23-CR-0162-DAD
17 Plaintiff,)
18)
19 vs.) STIPULATION AND ORDER TO CONTINUE
20) STATUS CONFERENCE AND EXCLUDE
21 JORGE OMAR ARREDONDO-GARCIA, et) TIME
22 al.,)
23 Defendant.) District Judge Dale A. Drozd
24) New Date: March 26, 2024
25) Time: 9:30 a.m.
26)
27

28 IT IS HEREBY STIPULATED and requested by and between the parties through their
1 respective counsel, ADRIAN KINSELLA, Assistant United States Attorney, attorney for the
2 GOVERNMENT; PATRICK McCARTHY, attorney for Defendant JORGE OMAR
3 ARREDONDO-GARCIA; DINA SANTOS, attorney for Defendant GREGORIO
4 ONTIVEROS VERDUGO; RACHELLE BARBOUR, attorney for Defendant JOSE MANUEL
5 ONTIVEROS VERDUGO; MARK REICHEL, attorney for Defendant ALBERTO NAVARRO
6 ZAPATA; and MICHAEL LONG, attorney for Defendant WILFREDO F. REYES, that the
7 status conference currently set for January 30, 2024, be continued to Tuesday, March 26, 2024,
8 at 9:30 a.m., and that time be excluded for preparation of counsel.

9 There is a protective order in this multi-defendant case. (Doc. 69.) The Government first
10 produced discovery consisting of approximately 700 pages of Bates-stamped documents and
11 over 73.9 gigabytes of native files, including cell phone databases and other items for defense
12

1 review. The Government then produced over 1400 pages of additional protected discovery.
2 Additional discovery is expected from the Government.
3

4 Since the start of the case, Defense counsel have been reviewing and analyzing the above,
5 conducting legal research, meeting with their clients, and otherwise preparing for trial. The
6 above tasks are ongoing, and the defense requires additional time to review discovery, discuss
7 the case with their clients and the Government, and continue to prepare. The parties believe that
8 failure to grant the requested continuance would deny defense counsel the reasonable time
9 necessary for effective preparation, taking into account the exercise of due diligence.
10

11 Accordingly, the parties stipulate and request that the Court exclude time between the
12 date of the filing of this stipulation through the new status conference date of March 26, 2024
13 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of
14 justice served by continuing the case as requested outweigh the interest of the public and the
15 defendant in a trial within the original date prescribed by the Speedy Trial Act.
16

17 Date: January 17, 2024
18

19 /s/ Patrick McCarthy
20 PATRICK McCARTHY
21 Attorney for Defendant
22 JORGE OMAR ARREDONDO-GARCIA
23

24 /s/ Dina Santos
25 DINASANTOS
26 Attorneys for Defendant
27 GREGORIO ONTIVEROS VERDUGO
28

29 HEATHER E. WILLIAMS
30 Federal Defender
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32 /s/ Rachelle Barbour
33 RACHELLE BARBOUR
34 Attorney for Defendant
35 JOSE MANUEL ONTIVEROS VERDUGO
36

37 /s/ Mark Reichel
38 MARK REICHEL
39 Attorney for Defendant
40 ALBERTO NAVARRO ZAPATA
41

/s/ Michael Long
MICHAEL LONG
Attorney for Defendant
WILFREDO F. REYES

DATED: January 17, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Adrian Kinsella
ADRIAN KINSELLA
Assistant U.S. Attorney
Attorney for the United States

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The status conference currently set for January 30, 2024, is hereby continued to Tuesday, March 26, 2024, at 9:30 a.m., and that time be excluded for preparation of counsel pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

IT IS SO ORDERED.

Dated: **January 17, 2024**

Dale A. Drozd
DALE A. DROZD
UNITED STATES DISTRICT JUDGE